

## REMARKS

Reconsideration of this application in view of the above amendments and the remarks below is respectfully requested. No claims are amended, added, or cancelled. Hence, Claims 10, 11, 14-16 and 33-52 are pending in the application.

Each issue raised in the Office Action mailed on July 9, 2007 is addressed herein.

### I. ISSUES RELATED TO CITED REFERENCES

#### A. 35 U.S.C. 102(b) - *BSAIBES*

Claims 10, 11, 33-41 and 45-48 are rejected under 35 U.S.C. 102(b) as allegedly anticipated by Bsaibes et al., U.S. Patent No. 5,701,458 (hereafter "*Bsaibes*"). The rejection is respectfully traversed.

#### **Independent Claim 33**

Claim 33 is directed to a method of comparing access control lists to configure a security policy on a network, and recites:

identifying first sub-entries in a first access control list, wherein the first access control list comprises multiple first access control entries, and wherein the first sub-entries identified from the first access control list comprise (i) disjoint entries of the first entries or (ii) overlapping sections identified from the first entries or (iii) non-overlapping sections identified from the first entries; and  
programmatically determining whether the first access control list is functionally equivalent to a second access control list by determining whether each of the first sub-entries in the first access control list is equivalent to or contained by one or more entries of multiple second access control entries in the second access control list.

According to claim 33, first sub-entries are identified from a first access control list that comprises first entries. The identified first sub-entries comprise 1) disjoint entries of the first entries, 2) overlapping sections identified from the first entries, or 3) non-overlapping sections identified from the first entries. Correspondingly, programmatically determining whether the first list and a second access are **functionally equivalent** in Claim 33 is by determining whether

each of the first sub-entries identified from the first list is equivalent to or contained by one or more entries of the second list, as recited in Claim 33.

*Bsaibes* describes an approach to permitting manipulation of an arbitrary set of access control lists in a hierarchical objects structure (*see* Abstract). According to *Bsaibes*, the hierarchical objects structure may be represented as a tree in FIG. 4A or FIG. 4B. A node in the tree may comprise an access control list as illustrated in FIG. 5 through 8. Thus, there may be as many access control lists as the number of nodes in the tree. *Bsaibes* provides a way that an action performed at a root node may alter an arbitrary set of access control lists residing at or underneath the root node.

As disclosed, *Bsaibes* fails to disclose each and every feature of Claim 33.

**1. *Bsaibes* Fails to Disclose Identifying Sub-entries in a First Access Control List in Claim 33.**

Claim 33 positively recites an identifying step. This step is “identifying first sub-entries in a first access control list, wherein the first access control list comprises multiple first access control entries, and wherein the first sub-entries identified from the first access control list comprise (i) disjoint entries of the first entries or (ii) overlapping sections identified from the first entries or (iii) non-overlapping sections identified from the first entries.”

The Office Action cites *Bsaibes*, at col. 5 line 65 -- col. 9 line 9, as disclosing all the features of Claim 33, including “identifying first sub-entries in a first access control list”. This multi-column passage cited by the Office Action is too long to recite in its entirety here. However, after a careful study of the cited passage by Applicant, nothing in that cited passage is found to have disclosed any subject matter resembling a positive step of identifying sub-entries in an access control list that comprises entries, wherein composition of sub-entries is as defined in Claim 33.

Since the Office Action claims there is subject matter in the cited portion of *Bsaibes* which can be reasonably regarded as analogous to the identifying step of Claim 33, to advance

prosecution, it is respectfully requested that Examiner provide a reasonable clarification as to where such subject matter in *Bsaibes* that is analogous to identifying sub-entries in an access control list, wherein sub-entries are as defined in Claim 33.

**2.     *Bsaibes* Fails to Disclose Programmatically Determining Equivalency of Access Control Lists in Claim 33.**

Claim 33 recites “programmatically determining whether the first access control list is functionally equivalent to a second access control list by determining whether each of the first sub-entries in the first access control list is equivalent to or contained by one or more entries of multiple second access control entries in the second access control list.”

The Office Action cites the same, multi-column passage in *Bsaibes* as disclosing the above-recited features of Claim 33. The cited passage again is devoid of subject matter resembling programmatically determining whether the first access control list is functionally equivalent to a second access control list by determining whether each of the first sub-entries in the first access control list is equivalent to or contained by one or more entries of multiple second access control entries in the second access control list as featured in Claim 33.

For the same reason set forth previously, it is respectfully requested that Examiner provide a reasonable clarification as to where such subject matter in *Bsaibes* that is analogous to programmatically determining whether the first access control list is functionally equivalent to a second access control list by determining whether each of the first sub-entries in the first access control list is equivalent to or contained by one or more entries of multiple second access control entries in the second access control list as featured in Claim 33.

**3.     The Cited Portion of *Bsaibes* Fails to Anticipate Claim 33**

The cited passage in *Bsaibes* describes how an **arbitrary** set of access control lists may be altered by an action documented in TABLE 1 of the reference (*see* col. 7, lines 30-64). For example, an action may be a Modify\_Delete (*Id.* at col. 8, line 49). A user “Tim” and a

permission “w” may be specified. When such an action is acted on node A, 700, in FIG. 6, Tim’s permission entry in the access control list that is associated with node A is compared with the permission specified with the action (i.e., “Modify\_Delete”). *See Bsaibes*, col. 8, lines 52-59. Tim’s “w” permission in the entry in the access control list, if any, is deleted (*Id.*). This may be repeated for every access control list found at or under node A. *See Bsaibes*, col. 8, line 60-col. 9, line 6.

Clearly, *Bsaibes*’s comparison for the purpose of carrying out this Modify\_Delete action is **between** permissions specified in **a command** and permissions specified in **an entry of an access control list**. As such, it would not be analogous to determining equivalency **between two access control lists**. For example, *Bsaibes* fails to disclose any subject matter resembling determining whether any two access control lists under node A are equivalent.

In *Bsaibes*, only a direct comparison between Tim’s permissions in his entry in the access control list and a permission specified in the command is needed. There is no disclosure in *Bsaibes* that Tim’s existing permission entry in the access control list is to be identified into sub-entries, let alone to be identified into sub-entries, wherein the sub-entries comprise the types as featured in Claim 33. Since the permissions specified in the command can be directly (and easily) compared with Tim’s permissions in his entry in the access control list, *Bsaibes* neither needs nor discloses such an identifying step analogous to what is featured in Claim 33.

For the reasons set forth, since *Bsaibes* fails to disclose at least one recited feature of Claim 33, Claim 33 is patentable over *Bsaibes*.

#### **Claims 36, 37 and 45**

Claims 36, 37 and 45 are independent claims that are similar in scope and include all features of method claim 33. Claims 36, 37 and 45 are patentable over *Bsaibes* for at least the same reasons as those given above in connection with claim 33.

#### **Claims 10, 11, 34-41 and 46-48**

Claims 10, 11, 34-41 and 46-48 depend from, and hence, incorporate all of the features of claim 33, 36, 37 or 45 that are discussed above. These claims also recite further features that independently render them patentable over *Bsaibes*. However, because *Bsaibes* lacks the features discussed above for claims 33, 36, 37, or 45, claims 10, 11, 34-41 and 46-48 necessarily are patentable over *Bsaibes* for at least the reasons given above in connection with claim 33, 36, 37 or 45.

**B. 35 U.S.C. 103(a) – BSAIBES and BRAWN**

Claims 14, 42 and 50 are rejected under 35 U.S.C. 103(a) as allegedly unpatentable over *Bsaibes* as applied to claims 33, 37 and 45 and further in view of Brawn et al., U.S. Patent No. 7,020,718 B2 (hereafter "*Brawn*"). The rejection is respectfully traversed.

Claims 14, 42 and 50 depend from, and hence, incorporate all of the features of claim 33, 36, 37 or 45. Claims 14, 42 and 50 also recite further features that independently render them patentable over *Bsaibes*. *Brawn* fails to disclose any of the features of claim 33, 36, 37 or 45 previously discussed and therefore *Brown* does not cure the deficiencies of *Bsaibes* that are described above, and any combination of *Brown* and *Bsaibes* necessarily cannot provide the complete subject matter of claims 14, 42, and 50. Claims 14, 42, and 50 are patentable over *Bsaibes* and *Brawn* for at least the reasons given above in connection with claim 33, 36, 37 or 45.

**C. 35 U.S.C. 103(a) – BSAIBES and MATE**

Claims 15, 43 and 51 are rejected under 35 U.S.C. 103(a) as allegedly unpatentable over *Bsaibes* as applied to claims 33, 37 and 45, and further in view of Mate et al., U.S. Patent No. 7,028,098 B2 (hereinafter "*Mate*"). The rejection is respectfully traversed.

Claims 15, 43 and 51 depend from and incorporate all of the features of claim 33, 36, 37 or 45. Claims 15, 43, and 51 also recite further features that render them patentable over *Bsaibes*. *Mate* fails to disclose any of the features of claim 33, 36, 37 or 45 previously discussed, and therefore *Mate* does not cure the deficiencies of *Bsaibes* that are described above, and any

combination of *Mate* and *Bsaibes* necessarily cannot provide the complete subject matter of claims 15, 43, and 51. Claims 15, 43, and 51 are patentable over *Bsaibes* and *Mate* for at least the reasons given above in connection with claim 33, 36, 37 or 45.

**D. 35 U.S.C. 103(a) – BSAIBES and BANGINWAR**

Claims 16, 44 and 52 are rejected under 35 U.S.C. 103(a) as allegedly unpatentable over *Bsaibes* as applied to claims 33, 37 and 45, and further in view of Banginwar, U.S. Patent No. 6,611,863 (hereafter "*Banginwar*"). The rejection is respectfully traversed.

Claims 16, 44 and 52 depend from, and hence, incorporate all of the features of claim 33, 36, 37 or 45. Claims 16, 44, and 52 also recite further features that render them patentable over *Bsaibes*. *Banginwar* fails to disclose any of the features of claim 33, 36, 37 or 45 previously discussed and therefore *Banginwar* does not cure the deficiencies of *Bsaibes* that are described above, and any combination of *Banginwar* and *Bsaibes* necessarily cannot provide the complete subject matter of claims 16, 44, and 52. Claims 16, 44, and 52 are patentable over *Bsaibes* and *Banginwar* for at least the reasons given above in connection with claim 33, 36, 37 or 45.

## II. CONCLUSIONS

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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